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DATE: 21st July 2020

Dear Sir/Madam

**Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as amended**

**Reference: DM/20/2267**

**Location: Land North Of Turners Hill Road Turners Hill West Sussex**

**Proposal: Screening Opinion for whether an outline planning application for a new single-chapel crematorium and natural burial facility would require an Environmental Impact Assessment**

I refer to your letter dated the 30th June 2020 regarding the above site and your request for the Council's formal Screening Opinion.

The Council is required to determine whether the application should be accompanied by an Environmental Impact Assessment, in accordance with Regulation 7 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as amended.

In the opinion of the Local Planning Authority, having taken into account the criteria in Schedule 3 of the 2017 Regulations, the proposed development, while constituting a Schedule 2 development, would not be likely to have a significant effect on the environment by virtue of the factors such as its characteristics, location and characteristics of potential impacts.

Characteristics and location of development

The proposal is for a commercial development on a 7.2ha parcel of land north of Turners Hill Road, Turners Hill, comprising two connected field parcels. The proposed development is for a single chapel crematorium with single abated cremator, plus 82-space car park, overspill area for 26 vehicles, servicing area providing 4 additional spaces for staff and business visitors, and natural burial area, landscaping and drainage. The proposal will utilise the existing access onto Turners Hill Road, with improvements to visibility. The existing footpath will be extended to the west. The building will be 4.4m in height with a maximum height from the floor level to the top of the flue and skylight of approximately 7m, although the building will be slightly elevated. Operational hours are likely to be from 0900-1700hrs Mondays to Fridays, with a maximum of 8 services a day and 40 a week.

The site is located within the countryside to the west of Turners Hill village and benefits from an extant permission for a natural burial ground. Whilst no buildings are currently on the

site, the vehicular access and car parking areas have been partially implemented and the footpath link to opposite the church has been wholly implemented. According to the indicative masterplan, it does not appear that the approved natural burial ground will be utilised, other than the car parking areas, access and maintenance/workshop building, plus some landscaping.

A public footpath (68W) cuts through the two field parcels and connects Turners Hill Road with Butcher's Wood ancient woodland to the east. Land opposite the site to the south is designated as the High Weald Area of Outstanding Natural Beauty, but no part of this site is within this area. The site is located within Flood Zone 1 with a spring just outside the north-eastern most part of the site flowing north-east as the River Medway.

The proposed development is likely to be of more than local importance, meeting the needs of Mid Sussex and neighbouring authority areas. However, the site is not located within a sensitive area as defined by the Regulations.

Overall it is not considered that the proposal would lead to significant environmental effects having regard to its characteristics and location.

#### Types and characteristics of the potential impact

The proposed development would constitute a Schedule 2 development, specifically Other Projects (11b). This is for installations for the disposal of waste by incineration and that the area of the development exceeds 0.5ha. The government's Planning Practice Guidance provides a set of indicative thresholds and criteria which may determine whether a project is likely to have significant environmental effects. Here it advises that sites taking smaller quantities of industrial wastes are unlikely to require EIA. The applicant confirms that the proposed development will be 'well below' these indicative criteria and thresholds. However, key issues to consider in the Guidance are the scale of the development and the nature of the potential impact in terms of discharges, emissions or odour.

#### *Traffic and transport*

There is the potential for adverse impact at the construction stage and at the operational stage. During construction, there will be an increased number of traffic movements in the local road network, but given the amount of building proposed, the development is unlikely to have significant impacts on the local road network. Once operational, the proposed development will generate additional traffic movements. Other than for staff, this would be an irregular destination and will attract a varying number of people from a wide catchment area and at different times of the day. The Highway Authority has been consulted by the applicant and has accepted the level of traffic generation based on a typical crematorium operation - i.e. each service at a crematorium would involve 19 cars (38 movements) and for a burial ground, 22 cars (44 movements) daily, thus over a week, there would be 316 vehicle movements. A Transport Assessment would be submitted with a planning application to provide detailed figures and it is not likely to have significant impacts on the highway network.

#### *Noise*

There is the potential for noise during the construction phase, but this would be a temporary outcome over a relatively short period of time. The closest residential receptor is approximately 330m away, and conditions could be applied to any planning permission to limit the hours of working, for example. At the operational stage, there will be comings and goings to and from the site and a Noise Report would be submitted with the application to

detail the impact from the proposed development to the surrounding area and local residents. Significant noise impact would therefore be unlikely.

#### *Air quality*

The proposed development will result in air emissions. An Air Quality Assessment would be submitted at the application stage, which would predict the impacts associated with flue emissions from the cremator. The flue height of 7m has been selected to ensure adequate dispersal of the exhaust gases and the predicted maximum process concentrations at sensitive receptor locations are shown to be within the relevant air quality standards for all pollutants considered.

Emissions from road traffic associated with the proposed development through the Ashdown Forest SAC/SPA will be screened through a Habitats Regulation Assessment. The potential traffic generation would be fed into the local transport model to indicate the overall impact on the Ashdown Forest.

#### *Biodiversity*

A Preliminary Ecological Appraisal was undertaken in March 2020, following several ecological surveys undertaken for previous applications on this site. No protected species were recorded during this latest PEA and the proposed development will ensure net biodiversity gain through on-site planting and formation/creation of new habitats.

The proposed layout has sought to avoid effects on field margins and hedgerows but potential adverse impact to Great Crested Newts and Reptiles has been considered. Previous survey work considered it unlikely that GCNs were present on the application site and an updated survey will be undertaken. Previously one adult grass snake was recorded at the northern boundary of the survey area, but no other reptiles were recorded. Updated survey work will be carried out and if the presence of reptiles is confirmed, all reptiles within the construction zone will be captured and translocated to a suitable receptor site prior to the commencement of works. This could be secured through a condition of any planning permission.

#### *Land contamination*

The previous use of the land was agricultural and so the potential for significant contamination is considered to be low.

The proposed development will result in natural burial and associated degradation of human remains, so there is the potential for pollution to controlled waters. The proposed layout avoids natural burials within 10m of the on-site drainage ditch and avoidance of natural burials within 30m of the spring just to the north-east of the site. This should ensure there is no significant contamination of controlled waters.

#### *Flood risk and water management*

During construction, there is potential for increased risk of contamination to the water environment through leaks and spills, but this can be controlled through good construction practice. Wastewater from sinks and toilets will be managed via an on-site package treatment works.

At the operational stage, surface water will be attenuated using SuDS and a flood risk assessment will be submitted as part of a planning application.

### *Landscape and visual impact*

The site lies within the High Weald National Character Area and opposite the High Weald Area of Outstanding Natural Beauty and adjacent to an ancient woodland. It is enclosed on all sides by hedgerows and trees, which provides existing visual screening and no landscape features (trees/hedgerows) will be lost, other than a gap between the two field parcels. It is noted that the approved chapel building is some 3m higher than the proposed building but further enhancement planting will be provided. The proposed development will occupy a much greater proportion of the application site than previous consents, which will have a greater impact on users of the public footpath, which will not be mitigated by this planting, and vehicles on Turners Hill Road. However, there will be limited inter-visibility between the proposed development and the AONB. A Landscape and Visual Impact Assessment will accompany the application.

### *Waste*

Waste will be produced during daily operations, and cremated human remains and metal will be dealt with as appropriate and can be detailed at the planning application stage.

### CONCLUSION

The site has the benefit of an extant planning permission for a natural burial ground, although no part of this is operational.

The proposed development has the potential for adverse impact during the construction works and operational phase. However, this is considered to be limited with minor disruption during the construction phase. In addition, there would be limited impacts on traffic and transport, noise, air quality, biodiversity, land contamination, water resources, landscape/visual receptors as a result of the development.

Having regard to the types and characteristics of potential impacts, adherence to standard legislation and guidelines, it is considered that significant residual effects on the environment are unlikely.

Accordingly, the Local Planning Authority directs that the development above for which planning permission is sought is **not EIA development**. Consequently no Environmental Impact Assessment is required to be submitted with any subsequent planning application.

This letter will be placed on the public register and on the Council's website, in accordance with Regulation 28(2).

Please do not hesitate to contact me if you have any further queries.

Yours faithfully



Divisional Leader for Planning and Economy

EISCRZ